

EXHIBIT C

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF
3 WEST VIRGINIA AT CHARLESTON

4 - - -
5 IN RE: ETHICON, INC.,: Master File No.
6 PELVIC REPAIR SYSTEM : 2:12-MD-02327
7 PRODUCTS LIABILITY : MDL 2327
8 LITIGATION :
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10 THIS DOCUMENT RELATES TO CASE
11 CONSOLIDATION:
12 Terreski Mullins, et al., v. Ethicon,
13 Inc., et al.
14 Case No. 2:12-CV-02952

15 - - -
16 September 17, 2015
17 - - -

18 Oral deposition of ANNE
19 HOLLAND WILSON, MBA, held in the offices
20 of Riker Danzig, 500 Fifth Avenue, New
21 York, New York 10110, commencing at
22 9:20 a.m., on the above date, before
23 Margaret Peoples, a Registered
24 Professional Reporter and Notary Public
in and for the States of Pennsylvania,
New York and Connecticut.

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27 - - -
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1 myself.

5 A. Really, QSIT inspections
6 have no bearing on my report.

7 I mean QSIT inspections
8 are -- you know, that's how FDA was
9 trained ten years ago on doing
10 inspections.

11 Some people still follow it,
12 but that really has no bearing on risk
13 management, quality management systems in
14 medical devices.

15 Q. Thank you, Ms. Wilson.

16 Let's talk about that for a
17 few more minutes, because you've raised
18 it.

19 You were asked a lot of
20 questions earlier about the FDA and
21 regulators.

1 A. No.

2 Q. Why not?

3 A. Because the same type of
4 regulations are in the other standards
5 that I did cite. This specifically was
6 not to talk about the FDA.

7 This is about there's
8 guidance documents out there. There's
9 documents that have been out there for 30
10 years that aren't specific to the FDA
11 that govern how medical device
12 manufacturers should do these things.

13 Q. So, in other words, if you
14 were told that your report -- the subject
15 of your report and your testimony at
16 trial, that you cannot mention the FDA,
17 is it fair to say that you could offer
18 your opinions at trial without even
19 mentioning the word "FDA"?

20 MR. COMBS: Objection to
21 form.

22 THE WITNESS: Absolutely.

23 BY MR. WALLACE:

24 Q. Were you ever -- you gave